



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

F. #2015R00200

July 10, 2015

By Email

Zachary Margulis-Ohnuma, Esq.  
260 Madison Avenue, Suite 1800  
New York, NY 10016

Re: United States v. Adamou Djibo  
Criminal Docket No. 15-088 (SJ)

Dear Mr. Margulis-Ohnuma:

In advance of the suppression hearing scheduled for July 13, 2015, enclosed please find materials pursuant to 18 U.S.C. § 3500 and Giglio v. United States, 405 U.S. 150 (1972).

The government requests reciprocal discovery. Specifically, the government requests that the defendant allow inspection and copying of: (i) any books, papers, documents, data, photographs, tapes, tangible objects, or copies or portions thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely on at the suppression hearing; and (ii) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely upon at the hearing, or that were prepared by a witness whom the defendant intends to call at the hearing.

The government also requests that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. In order to avoid unnecessary

delays, the government requests that the defendant have copies of those statements available for production to the government before the hearing.

Very truly yours,

KELLY T. CURRIE  
Acting United States Attorney

By: /s/ Karen Koniuszy  
Karen L. Koniuszy  
Assistant U.S. Attorney  
(718) 254-6072

Enclosures

cc: Clerk of the Court (SJ) (by ECF) (without enclosures)